

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

IN RE:)
) CASE NO. 14-33635-KLP
David Paschal Makhanlall)
Savitri Devi Makhanlall)
) CHAPTER 13
)
Debtor(s))
_____)

RESPONSE TO OBJECTION TO PLAN

Now comes the Debtor(s) in this matter, by counsel, and as and for Debtor(s)
Response to the Trustee's Objection filed on 08/12/2015 to the Debtor(s)' Chapter 13
Plan says as follows:

1. That they admit the allegations set forth in paragraphs 1, 2, and 5 of the Objection.
2. That they deny the allegations set forth in paragraphs 3, 4 and 6 of the Objection and state as follows:
 - a. That their previously confirmed plan paid \$545.00 per month for 60 months for a total plan funding of \$32,700.00.
 - b. That the previous and current monthly budget as stated on Schedules I and J is \$484.00 per month.
 - c. That the plan currently before the court for confirmation pays \$545.00 for the first 11 months and then pays \$600.00 per month for the remaining 49 months for a total plan funding of \$35,395.00.
 - d. Both plans provide a 36% dividend to the unsecured creditors.

WHEREFORE, Debtor(s) respectfully move the Court that the Plan be confirmed.

Respectfully submitted:

David Paschal Makhanlall
Savitri Devi Makhanlall
BY: /s/ Richard J. Oulton
Counsel

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Certificate of Service

I certify that on August 13, 2015, I sent a true copy of the foregoing Answer by ECF transmittal, first class mail, postage prepaid, via e-mail or fax to the following parties:

Carl M. Bates
By ECF Transmission

/s/ Richard J. Oulton
Richard J. Oulton